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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF ARIZONA**

17 United States of America,
18 Plaintiff/Respondent,
19 v.
20 Abdul Malik Abdul Kareem,
21 Defendant/Movant.

2:15-cr-00707-SRB

22 **MOTION TO APPOINT MAUREEN**
23 **BAIRD AS DEFENSE EXPERT**

24 Defendant Abdul Malik Abdul Kareem (“Mr. Kareem”) moves the Court to
25 appoint Maureen Baird (“Ms. Baird”) as an expert based on her experience, training,
26 and education in federal corrections. Her specialized experience will help the court
27 understand the evidence and determine facts in evidence at the sentencing hearing.

28 Ms. Baird has an extensive history with the federal correctional system. She has
been a warden at three U.S. Bureau of Prisons (BOP) facilities; U.S. Penitentiary

1 (USP), Marion, IL; Metropolitan Correctional Center (MCC), New York City, NY; and
2 Federal Correctional Institution (FCI), Danbury, CT. Her career in the BOP spanned 28
3 years, beginning as a case manager at FCI Danbury. She has a Bachelor of Science in
4 Justice and Law Administration from Western Connecticut State University. She is a
5 Senior Executive Service Member, and a member of the American Correctional Public
6 Information Officer Association and the Association of Women Executives in
7 Corrections. Her qualifications are further set forth in her attached resume.

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9 She will testify that she is familiar with policies and practices followed by the
10 BOP, especially as it pertains to maintaining security in BOP facilities and protecting
11 the public from inmates. It is a general practice for law enforcement officers to meet
12 with the warden of the facility either before or after meeting with an inmate of the
13 facility to share any security concerns regarding for other inmates in the facility or
14 others outside the facility. She will testify that had she been presented with information
15 regarding threats by a BOP inmate to injure people outside a BOP facility of the nature
16 contained in the government's 64 pages of disclosure regarding Mr. Kareem, she would
17 have taken prompt action to increase security measures regarding the inmate, including
18 enhancing phone monitoring, cell searches, and possibly placing him in the special
19 housing unit or transferring him to a higher level of security such as a USP.

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21 The fact that Mr. Kareem remained at FCI Florence, a medium level facility, and
22 later was transferred to another medium level facility, FCI Phoenix, indicates to her that
23 the BOP took no action to sanction Mr. Kareem based on the allegations contained in
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1 the government's 64 pages of disclosure. This suggests to her that the BOP did not
2 view the threats as credible.

3 Mr. Kareem requests the Court to enter an order approving funds for Ms. Baird
4 for her services at the rate of \$225.00 per hour for 20 hours, for a total amount not to
5 exceed \$4,500.00 pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A(e). The total
6 hours include reviewing government disclosures regarding the investigation into the
7 alleged threats (approximately 1 hour for the 64 pages currently disclosed and future
8 disclosures) and the BOP handling of Mr. Kareem. Counsel for Mr. Kareem and the
9 government have agreed that Ms. Baird's testimony may be presented via telephone to
10 eliminate travel costs. That would reduce the total bill for Ms. Baird's services.
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13 RESPECTFULLY SUBMITTED this 13th day of September, 2021.
14

15 **MAYNARD CRONIN ERICKSON &**
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